

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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In re:

NATIONAL FORGE COMPANY, et al.,

Debtor.

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OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF NATIONAL FORGE  
COMPANY,

Civil No. 04-21 Erie

Plaintiff,

and

OFFICIAL COMMITTEE OF RETIREES  
OF NATIONAL FORGE COMPANY,

Intervenor,

v.

E. ROGER CLARK, both Individually and as  
an Officer and Director of National Forge  
Company, et al.,

Defendants.

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DEFENDANTS E. ROGER CLARK'S, MAURICE J. CASHMAN'S,  
DANA BEYELER'S AND ROBERT A. KAEMMERER'S INITIAL  
DISCLOSURES PURSUANT TO FED.R.CIV. P. 26(a)(1)

Defendants E. Roger Clark, Maurice J. Cashman, Dana Beyeler and Robert A.  
Kaemmerer (the "Defendants"), pursuant to Fed.R.Civ.P. 26(a)(1), make the following  
disclosures:

1. The following (in addition to the Defendants themselves) may have discoverable  
information that the Defendants may use to support their claims and defenses:

(a) Defendant JPMorgan Chase & Co.

- (b) PricewaterhouseCoopers, LLP  
U.S. Steel Tower  
600 Grant Street  
Pittsburgh, PA 15219  
Telephone: (412) 355-8600
- (c) William T. Cullen, Esquire  
Kirkpatrick & Lockhart Nicholson Graham LLP  
Henry W. Oliver Building  
535 Smithfield Street  
Pittsburgh, PA 15222  
Telephone: (412) 391-8500
- (d) Valuemetrics, Inc.  
150 East 52<sup>nd</sup> Street  
16<sup>th</sup> Floor  
New York, NY 10022  
Telephone: (212) 980-5800

2. The documents that the Defendants may use to support their claims and defenses are those that the Defendants included in the Appendix filed in conjunction with their Motion for Summary Judgment as to Counts I through VII of the Amended Complaint.

3. The Defendants have asserted no claim for damages.

4. The Defendants may be insured under a policy of insurance issued by Gulf Insurance Group, and Gulf Insurance Group may be liable to satisfy part or all of any judgment entered against the Defendants in this action.

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Dated: February 15, 2006

Respectfully submitted,

/s/ Erik Sobkiewicz

Douglas A. Campbell

PA I.D. No. 23143

Erik Sobkiewicz

PA I.D. No. 56836

CAMPBELL & LEVINE, LLC

1700 Grant Building

Pittsburgh, PA 15219

Telephone: (412) 261-0310

Counsel for Defendants E. Roger  
Clark, Maurice J. Cashman, Dana  
Beyeler and Robert A. Kaemmerer